

3. The complaint names ExamWorks Group, Inc. as a defendant to this action. It is alleged in the Complaint, among other things, that ExamWorks Group, Inc. intentionally interfered with Plaintiff's contract with The Hartford, and further that ExamWorks Group, Inc. owed a duty of care to Plaintiff in relation to certain independent medical examinations and/or independent medical reviews that were performed in connection with her claim for disability benefits. However, ExamWorks Group, Inc. and its subsidiary Reliable RS, LLC had no relation to Plaintiff's claim for disability benefits or the independent peer review and medical exams that were conducted. As such, ExamWorks Group, Inc. is an improper party to this lawsuit.

4. ExamWorks Group, Inc. is a Delaware corporation under file number 4839695. It is a public holding parent company and does not engage in any operations.

5. On December 5, 2014, Orange11, LLC, a Delaware limited liability company under file number 5651871, was newly formed. ExamWorks Group, Inc. is the ultimate parent company of Orange11, LLC.

6. On January 2, 2015, Orange11, LLC changed its name to Reliable RS, LLC ("Reliable DE").

7. According to the Colorado Secretary of State public records, there is another, different company and legal entity with a similar name to Reliable DE called ReliableRS, LLC. ReliableRS, LLC is a Colorado limited liability company with ID number 20031223888 ("Reliable CO").

8. On January 2, 2015, Reliable DE purchased certain assets of Reliable CO but did not assume its liabilities.

9. Neither ExamWorks Group, Inc. nor Reliable DE is related to, has any direct or indirect ownership interest in, or is otherwise affiliated with Reliable CO.

10. ExamWorks Group, Inc. and Reliable DE were *not* retained by The Hartford to schedule the independent medical examination or peer reviews set forth in the Complaint.

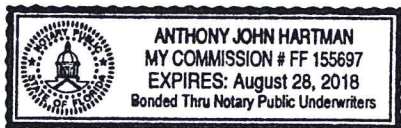
11. It is clear that counsel for Plaintiff has sued the wrong entities that were tasked with effectuating the peer reviews and medical examination of Dr. Chau.

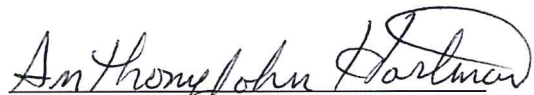
12. Accordingly, I respectfully request that the Court grant defendants' motion to dismiss as ExamWorks Group, Inc. is an improper party to this action.


Clare Arguedas

STATE OF FLORIDA
COUNTY OF SARASOTA

Sworn to and subscribed before me this 17th day of August, 2015 by Clare Arguedas, who is personally known to me.




Anthony John Hartman
Notary Public